



Department of
**Environment &
Conservation**

General Permits and Permit-by-Rule: New permitting options from APC

SBEAPs at a glance

- The Clean Air Act Amendments of 1990 required states to establish a program to assist small businesses in understanding and complying with regulations.
- We are here to help on any environmental question a small business may have.
- Provide a free, confidential, single point of contact for technical assistance.

How has the SBEAP helped?

- Directly assisted 281 companies or individuals in the last year from 59 different categories of businesses
- Involved in the APC Fee Change process, General Permits, and Permit-by-Rule for new industry groups.
- SBEAP is working closely with Air Pollution Control in developing permitting methods that will be easier, quicker, and less expensive for small businesses

New Permitting Options

- General Permits for Concrete Batch Plants source category
- Permit-by-Rule for Auto body shops and Stationary Emergency Engines



General Permits

- Dry cleaner source category was first group
- Concrete Batch plants is planned to be next.
- Affects approximately 161 different manufacturing facilities.
- Three parts:
 - Notice of Intent
 - Notice of Coverage
 - General Permit
- Provides the same permit for all sources within that category
- Currently in draft stage

General Permits – How they work

- First, apply with a Notice of Intent.
 - Form that combines both the APC 100 Facility Identification and the APC 110 Dry Cleaner Source forms.
- If it is a Notice of Intent involving construction, such as a new facility, the TDEC website will be used to comply with public notification requirements.
- APC will issue a Notice of Coverage and provide a copy of the General Permit.
 - Notice of Coverage explains when the coverage becomes effective and when it expires.
 - The general permit provides the conditions that the facility must follow to remain in compliance.



**NOTICE OF INTENT (NOI) FOR DIVISION OF AIR POLLUTION CONTROL
 GENERAL PERMIT - DRY CLEANER SOURCES**

SITE INFORMATION			
Organization's legal name		For APC use only	APC Company point number
			APC Log/Permit number
Site name (if different from legal name)		County name	
Site address (St./Rd./Hwy.)		City or distance to nearest town	Zip code
DCERP Facility ID number		Secretary of State ID number	
CONTACT INFORMATION (RESPONSIBLE PERSON)			
Responsible person/Authorized contact		Phone number with area code	
Mailing address (St./Rd./Hwy.)		Fax number with area code	
City	State	Zip code	Email address
CONTACT INFORMATION (TECHNICAL)			
Principal technical contact		Phone number with area code	
Mailing address (St./Rd./Hwy.)		Fax number with area code	
City	State	Zip code	Email address
TYPE OF NOTIFICATION OF COVERAGE (NOC) REQUESTED			
<input type="checkbox"/> New Construction Permit	<input type="checkbox"/> Renewal of Existing Permit/NOC	<input type="checkbox"/> Modification (specify in comments)	
Construction Starting Date:	APC Facility ID number:	Modification Start Date:	
Construction Completion Date:	Last Permit or Notification of Coverage number:	Modification Completion Date:	
Describe changes and/or modifications that have been made or are planned to be made to this equipment or operation since the last permit application:			
FACILITY SPECIFICATIONS			
Is this facility located in a building with a residence? Yes <input type="checkbox"/> No <input type="checkbox"/>			
SOLVENT (Check cleaning agent used)			
<input type="checkbox"/> Perchloroethylene	<input type="checkbox"/> Petroleum (Specify)	<input type="checkbox"/> Other (Specify)	

General Permits – How they work

- The general permit will expire every 10 years and will require a new Notice of Intent prior to the expiration.
- Concrete Batch plants with a General Permit would have the same permit as other Concrete Batch plants.
- Similar to the Ready-Mix Concrete Storm Water permit most would have from Division of Water Resources.
- General permits are an option as opposed to facility specific permits (i.e. standard permits).

General Permits – Benefits

- APC will be able to issue permits more quickly
- General permits will require less paperwork and individualization of permits
- All dry cleaners will have essentially the same requirements across TN, normalizing permit conditions
- No application fee (*Subject to change*)
- Can act as both a construction and an operating permit

Permit-by-Rule (PBR)

- Permit-by-Rule is available!
 - Initial groups are Gasoline Dispensing Facilities (GDFs), auto body shops, and Emergency Engines
 - These groups were chosen due to the large number of sources
 - APC has already permitted over 1400 GDFs and nearly 500 stationary emergency engines
 - The Permit-by-Rule program does not apply to Title V or Conditional Major sources.

Permit-by-Rule (PBR)

- Transition program has ended
- Gasoline Dispensing Facilities PBR was implemented August 15, 2017
- Auto Body and Stationary Emergency Engines was implemented April 8, 2018
 - Currently making some changes to Notice of Intent (NOI) prior to contacting facilities in the Transition program.

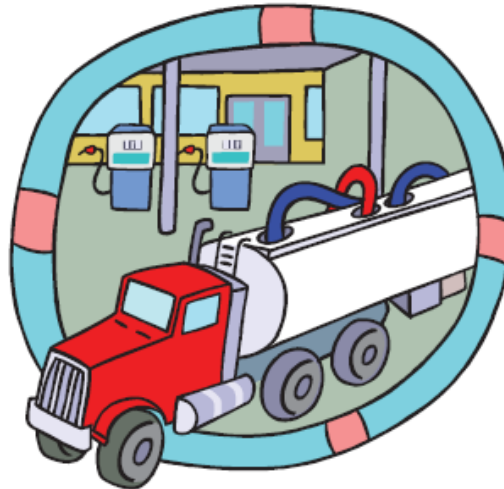
Permit-by-Rule (PBR) - How it works

- Only true minor sources are eligible for PBR.
- Facility submits a Notice of Intent (NOI).
- APC issues a Notice of Authorization (NOA).
- Facility will not receive a permit.
- Facilities with a standard permit can opt to switch to PBR once implemented.
- Facilities can refer to guidance manuals developed or the rule itself for requirements.

PBR for GDF Compliance Manual example



TN Division of Air Pollution Control
Permit-by-Rule Compliance Manual
For Gasoline Dispensing Facilities



Permit-by-Rule (PBR) – Benefits

- Processing time is reduced
- Acts as both a construction and an operating permit
- No expiration date.
- No application or emission fees. (*Subject to change*)
- Easier transfer of ownership or facility name changes.
- No specific limits

Tennessee Small Business Environmental Assistance Program

800-734-3616 or BGSBEAP@tn.gov

- **Find us on Facebook at: TN Small Biz Buzz**
- **Or on Twitter at @TNSmallBizBuzz**



Serving Small Businesses and the Environment